

Headquarters Deletion Concurrence – Checklist
American Crossarm & Conduit Co. Superfund Site (Chehalis, Washington)

SITE MILESTONES

- ✓ Is the site being deleted based on Resource Conservation Recovery Act deferral? If yes, skip to “deletion criteria.”

No.

- ✓ Is the site construction complete?

Yes, as of September 26, 1996.

- ✓ Does the site require five-year reviews (FYRs)? If EPA has completed a FYR, what was the last completion date? What is the site’s site-wide protectiveness determination?

Yes. Policy FYRs are required at the site because contamination remains at the site above levels which allow for unlimited use and unrestricted exposure. The fifth five-year review was completed on September 17, 2019. The implemented actions taken at the American Crossarm & Conduit Co. Superfund Site were found to be protective of human health and the environment in the short-term. The five-year review had two issues or recommendations. To be protective in the long-term, the ACC site needed an updated Operations and Maintenance (O&M) Plan and review and update of implemented O&M activities; and a review of historic activities to determine if additional measures need to be taken regarding potential PFAS contamination. The site O&M Plan was updated, and EPA determined PFAS was not used at the site. The next FYR is scheduled for September 2024.

- ✓ Are the environmental indicators Human Exposure Under Control and Ground Water Migration Under Control?

Yes –Human Exposure is under control.

Yes – Ground Water Migration is under control.

- ✓ Has the site been determined to be “Sitewide Ready for Anticipated Use”?

Yes, as of September 2, 2015.

- ✓ Are institutional controls (ICs) required at the site? Are ICs in a decision document?

Yes, the Record of Decision (ROD) was signed on June 30, 1993. The three parcels comprising the former facility are the only locations where contamination was left in place which required ICs. ICs on the former facility area were implemented in an August 1997 Protective Covenant filed with the Lewis County Assessor’s Office. The covenant prohibits groundwater well installation or use; residential or agricultural land use; or any intrusive activities. The two northern parcels were subsequently sold. After approval from EPA and Ecology, the same prohibitions were included in the Consent Order for the new redevelopment landowner. The Consent Order required the landowner to conduct required maintenance activities.

- ✓ Did the region complete a final close-out report (FCOR)? Was the FCOR complete and consistent with guidance? Is the FCOR date in SEMS?

Yes, EPA Region 10 completed a FCOR for the site on June 2, 2020.

DELETION CRITERIA

- ✓ Does the Region have the state concurrence letter?

Yes, the State of Washington Department of Ecology concurred with the proposed deletion action on June 8, 2020.

- ✓ Is the state concurrence and FCOR in the deletion docket? Is the docket available in the site repositories?

Yes.

- ✓ Has a Federal Docket Management System docket phase been opened for the deletion? Are the deletion docket documents uploaded or referenced in this docket?

Yes.

- ✓ Were all the Headquarters regional coordinator's significant comments addressed and/or resolved?

Yes.

- ✓ If a direct deletion, were both documents sent to Headquarters for review?

N/A

- ✓ Does the document use the most current deletion templates?

Yes.

- ✓ Are there any community concerns about the site?

No.

- ✓ Are there any reuse/redevelopment opportunities?

Yes. Despite the site's favorable location, a \$15.5 million EPA cleanup lien against the site presented a barrier to developers. In the late 1990s, EPA agreed to remove its lien on the condition that any new owners add fill so the property would be above the flood plain. Owners must also agree with ICs and not sell the property without passing on the land use restrictions. New on-site structures were constructed in 1998. After construction, the owner sold the building, which is currently being used as a machine and repair shop. A second two-story building constructed on site currently houses a fitness center and Head Start children's facility. As of December 2019, EPA had data on 12 on-site businesses. These businesses employed 68 people and generated an estimated \$18,224,000 in annual sales revenue. The third site parcel is currently for sale.

- ✓ Is the Region planning an event for the deletion?

No. – The Region will issue a press release to announce the deletion when it is effective.

BASIS FOR SITE DELETION

Verify the following information is included in the “basis for site deletion” section (as appropriate):

- ✓ Site Background and History
 - Provide nearest city, county, state;
 - Describe the physical locations and boundaries of the site;
 - Describe former use;
 - Describe site conditions resulting in listing;
 - Provide *Federal Register* citation of proposed and final NPL listing;
 - Describe removals conducted (if applicable); and
 - Describe ongoing or potential redevelopment (if applicable).
- ✓ Remedial Investigation and Feasibility Study
 - Describe scope of remedial investigation; and
 - Describe findings from feasibility study.
- ✓ Record of Decision Findings
 - Describe the major components of the selected remedy;
 - Describe remedial action objectives; and
 - Describe any explanation of significant differences or ROD amendments.
- ✓ Response Actions
 - Summarize remedial design/remedial action activities.
- ✓ Cleanup Standards
 - Describe information or data obtained to demonstrate that cleanup levels have been achieved.
- ✓ Operation and Maintenance (if applicable)
 - Describe ongoing or completed O&M;
 - Describe any continuing site monitoring; and
 - Describe institutional controls implemented, including where filed and how verified.
- ✓ Five-Year Review (if applicable)
 - Describe results of any previous FYR; and
 - Indicate the schedule for the next FYR.
- ✓ Community Involvement
 - Describe major community involvement activities; and
 - Describe community involvement activities associated with deletion.
- ✓ Determination that the Site Meets the Criteria for Deletion
 - Explain why the site meets the substantive NPL deletions criteria; and
 - Describe how the region has followed 40 CFR 300.425(e) procedures.